

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
WELLINGTON REGISTRY**

**I MUA I TE KOOTI TAIAO O AOTEAROA  
TE WHANANGUI-A-TARA ROHE**

**ENV-2024-WLG-000044**

**UNDER THE** Resource Management Act 1991

**IN THE MATTER OF** an appeal under clause 14(1) of Schedule 1 of the  
Resource Management Act 1991

**BETWEEN** **ROYAL FOREST AND BIRD PROTECTION  
SOCIETY OF NEW ZEALAND**

Appellant

**AND** **WELLINGTON REGIONAL COUNCIL**

Respondent

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**NOTICE OF HUTT CITY COUNCIL'S WISH TO BE A SECTION 274 PARTY TO  
THE PROCEEDINGS**

9 December 2024

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**BUDDLEFINDLAY**  
Barristers and Solicitors  
Wellington

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**TO:** The Registrar  
Environment Court  
Wellington

1. Hutt City Council (**HCC**) wishes to be a party to the appeal proceedings lodged by the Royal Forest and Bird Protection Society of New Zealand (**Appellant**) in respect of the decisions of Wellington Regional Council (**GWRC**) on Proposed Change 1 (**PC1**) (and Variation 1) to the Wellington Regional Policy Statement (**Decisions**).
2. HCC is a local authority. HCC also made a submission on PC1 dated 14 October 2022.
3. HCC is not a trade competitor for the purposes of sections 308C or 308CA of the Resource Management Act 1991 (**RMA**).
4. HCC is interested in the parts of the proceedings (including the grounds and relief sought) relating to:
  - (a) in Chapter 3.8 Natural hazards:
    - (i) Objective 19; and
    - (ii) Objective 21; and
  - (b) in Chapter 4.1 Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan:
    - (i) Policy CC.7;
    - (ii) Policy CC.8; and
    - (iii) Policy 29.
5. HCC opposes the grounds and relief sought by the Appellant in respect of the above provisions for the following reasons:
  - (a) they set inappropriately high 'avoid' standards and place undue and/or overly burdensome restrictions on infrastructure and development;
  - (b) they would result in inconsistencies between RPS provisions (and between the RPS and higher order documents including the National Policy Statement on Urban Development);
  - (c) they represent overly prescriptive, unclear and/or potentially unworkable provisions (including regulatory policies); and

- (d) they do not serve a resource management purpose, promote the sustainable management of natural and physical resources in accordance with section 5, further the principles of Part 2, or otherwise accord with the RMA.
- 6. HCC agrees to participate in mediation or other alternative dispute resolution of the proceedings.



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**Thaddeus Ryan / Esther Bennett**  
Counsel for Hutt City Council

Dated: 9 December 2024

Address for service of person wishing to be a party:

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